



November 7, 2001

United States
Department of
Agriculture

Marketing and
Regulatory
Programs

Animal and
Plant Health
Inspection
Service

Washington, DC
20250

SUBJECT: Moratorium on Issuing Permits for Importation of Certain Organisms

TO: USDA-APHIS-PPQ Stakeholders, Permit Applicants,
and Permit Holders

USDA/APHIS is very concerned about incidents that occurred on and following September 11, 2001. As an integral part of increased national efforts to reduce the possibility of any biosecurity threats, we are intensely examining our regulations, policies, procedures, and documents pertaining to the importation of certain organisms including living plant pests, plant pathogens, genetically modified organisms, and biological control organisms. This review is being conducted with an eye to the potential for misuse of these systems to deliberately introduce harmful organisms into the United States.

In cooperation with USDA's Office of the Inspector General (OIG) we have already identified several significant weaknesses in the current system, including the fact that the system has been based largely on a high level of trust in permit recipients. Although we are not aware of any adverse incidences resulting from the use of our permits, we are now reevaluating this pathway to prevent the intentional importation of organisms that could be detrimental to our agriculture, environment, and citizens.

On September 21, 2001, we stopped issuing new permits for the importation of certain organisms under certain circumstances. This temporary stoppage is only to allow us time to correct identified deficiencies in our permit documents, policies, and permit monitoring and tracking procedures. As soon as the most critical deficiencies are corrected, we will resume issuing new importation permits. We anticipate certain deficiencies to be corrected quickly. In some cases we have already implemented changes or are confident in existing procedures and are again allowing for select importations. This moratorium does not apply to the following types of permit applications:

- Applications for interstate movement;
- Applications for environmental release when the organism has already been imported under an APHIS permit;
- Modifications to existing permits for importations into previously approved containment facilities;
- Applications for importing plants or plant products, except Federal noxious weeds;
- Applications for importing soil into approved facilities.

We will continue to update you regularly on the status of this moratorium through information posted on the USDA-APHIS-PPQ website
<<http://www.aphis.usda.gov/ppq/permits>>



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For further information or clarification on this issue, please contact Deborah Knott, Permits Branch Chief, at 301-734-5055 or Deborah.M.Knott@aphis.usda.gov; or Robert Flanders, Risk Assessment Branch Chief, at 301-734-5930 or Robert.V.Flanders@aphis.usda.gov.

A handwritten signature in cursive script, appearing to read "R. Dunkle".

Richard L. Dunkle
Deputy Administrator
Plant Protection and Quarantine